

Ryan J. Riehl

Member

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With nearly two decades of experience, Ryan Riehl focuses his practice on a wide variety of federal and state tax issues for publicly traded companies, closely held businesses, real estate developers, oil and gas producers, financial institutions, investors, manufacturers, distributors, inventors, and individuals.

Ryan handles a broad range of federal and state tax planning and structuring issues, with a focus on international tax planning issues for foreign multinational companies making investments in the U.S. and domestic companies doing business abroad. His practice also encompasses advising on partnership taxation, like-kind exchanges and other real estate tax matters, taxation of oil and gas properties, tax planning in connection with business acquisitions, dispositions and reorganizations, and private equity transactions

Ryan frequently assists clients with economic development projects, including state and local tax abatements and other incentives in a number of states, including Michigan. He has

practices & industries

Tax
Business
Municipal Law and Finance

education

Wayne State University
Law School, J.D., *summa cum laude*
Wayne State University
Law School, LL.M.
Michigan State University,
B.A., with high honors

admissions

Michigan

varied experience representing clients in obtaining and structuring numerous federal and state tax credits, including Brownfield, Low Income Housing, New Markets, Historic, Solar, Wind and other Renewable Energy credits.

HONORS, AWARDS, AND RECOGNITION

- *Michigan Rising Stars 2014-2018, Tax*

PUBLICATIONS

- "The Buck Stops Here: Michigan Tax Experts See Savings, Downsides In New Federal Law," *Corp! Magazine*, June 2019

SPEAKING ENGAGEMENTS

- Co-presenter, "Understanding Michigan's New Elective Pass-Through Entity Tax," State Bar of Michigan Taxation Section webinar, February 16, 2022
- "2021 Tax Law Changes," The Friedman Real Estate Group, October 27, 2021
- "Tax Issues with Oil and Gas Investments," King Operating Corporation Roundtable, September 29, 2021
- "PPP Loan Audits: What To Expect And How To Prepare," Detroit Regional Chamber webinar, October 6, 2020

REPRESENTATIVE MATTERS

Representative Municipal Matters:

- Issued tax opinions and advice related to one of the largest municipal bankruptcies in the US.
- Review tax-exempt bond opinions for various, municipalities, school districts, and tax-exempt organizations.
- Worked with rural municipality to monetize benefits from federal and state of Illinois Historic Tax Credits.
- Represented municipalities, universities, school districts, and tax-exempt organizations in handling tax compliance issues.

Representative Transactions *(Prior to joining Bodman)*

- **New Markets Tax Credit Financing.** Represented a global tire manufacturer in NMTC financing in construction and equipping of a new manufacturing facility in South Carolina. Scope of representation involved structuring the transaction and drafting tax opinions regarding validity of the leveraged NMTC structure, put and call options, etc. The transaction involved five community development organizations (CDEs) and over \$55,000,000 of NMTC allocation, which, at the time, was the largest NMTC allocation for a single project.
- **REIT Spin-out and Initial Public Offering.** Represented a multi-fund private equity firm on the spin-out and “roll up” of more than 20 companies holding 16 office properties consisting of 1.85 million sq. ft. of rentable space in five states, and in connection with an initial public offering of common stock.
- **1031 Exchange Accommodator Transactions.** Represented a publicly traded bank’s like-kind exchange services group in connection with more than 300 like-kind exchange transactions ranging in value from \$800,000 to \$300,000,000, including forward and reverse like-kind exchanges, build-to-suit exchanges, related-party exchanges, exchanges involving fractional interests in property such as tenancy-in-common interest, Delaware Statutory Trusts, and various types of working/non-working oil and gas interests.
- **OEM Suppliers Tax Credit Claim.** Assisted in the preparation of over \$50,000,000 R&D tax credit claims for large OEM suppliers and successfully defended substantially all of such claim on audit.
- **European Automotive Supplier Tax Planning.** Developed and coordinated tax planning for \$560,000,000 stock and asset acquisition of companies in the U.S. and 12 foreign countries by a European automotive supplier.
- **Oil and Gas Independent Producers.** Issued tax opinions and structured tax aspects of \$200,000,000 of various types of private placement offerings of oil and gas

interests, including, working interests, net profits interests, royalty interests and Delaware Statutory Trusts.